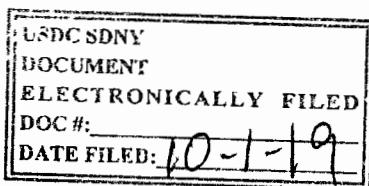


**Hughes
Hubbard
& Reed**



Hughes Hubbard & Reed LLP
One Battery Park Plaza
New York, New York 10004-1482
Telephone: +1 (212) 837-6000
Fax: +1 (212) 422-4726
hugheshubbard.com

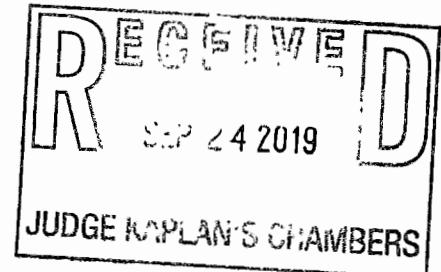
Marc A. Weinstein
Partner
Direct Dial: +1 (212) 837-6460
Direct Fax: +1 (212) 299-6460
marc.weinstein@hugheshubbard.com

MEMO ENDORSED

September 19, 2019

BY HAND

Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007



Re: In re Customs and Tax Administration of the Kingdom of Denmark
(Skatteforvaltningen) Tax Refund Scheme Litigation, 18-md-2865 (LAK)

Dear Judge Kaplan:

We write on behalf of Plaintiff Skatteforvaltningen, the Customs and Tax Administration of the Kingdom of Denmark (“SKAT”), to notify the Court of an apparent technical error. The docket in this action lists Richard Markowitz twice: once, correctly, as a Defendant represented by Wilmer Cutler Pickering Hale & Dorr LLP; and once, incorrectly, as a Plaintiff *pro se*. We have conferred with counsel for Mr. Markowitz and they have confirmed that the latter listing is erroneous. Accordingly, we respectfully request that the Court direct the Clerk to remove the listing identifying Mr. Markowitz as a Plaintiff *pro se* from the docket.

SO ORDERED
LEWIS A. KAPLAN, USDI
10/1/19
All counsel of record (via email)

Respectfully submitted,

Marc A. Weinstein
Marc A. Weinstein